

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

CARLOS RAMIREZ,

on behalf of himself and all others  
similarly situated,

Plaintiff,

v.

THE PARADIES SHOPS, LLC,  
a Georgia limited liability company,

Defendant.

Case No.: 1:21-cv-03758-ELR

**JOINT NOTICE OF PROPOSED  
CLASS ACTION SETTLEMENT  
AND JOINT MOTION TO REOPEN  
CASE**

Plaintiff, Carlos Ramirez, and Defendant, The Paradies Shops, LLC, (collectively, the “Parties”) jointly inform the Court pursuant to its Minute Order of June 24, 2024 that the Parties have finalized execution of a proposed class action settlement (“Settlement Agreement”) and obtained approval of Defendant’s insurance carriers. By October 7, 2024, the Parties will submit a Motion for Preliminary Approval of Class Action Settlement. The Parties jointly request that the case be returned to open status before that time for this purpose.

For Plaintiff:

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/s/ Peter N. Hall

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<p>(404) 965-1885 dbess@forthepeople.com</p> <p>John A. Yanchunis <b>MORGAN &amp; MORGAN COMPLEX BUSINESS DIVISION</b> 201 N. Franklin Street, 7th Floor Tampa, Florida 33602 (813) 223-5505 jyanchunis@ForThePeople.com</p> <p><u>/s/ Ryan D. Maxey</u> Ryan D. Maxey <b>MAXEY LAW FIRM, P.A.</b> 107 N. 11th St. #402 Tampa, Florida 33602 (813) 448-1125 ryan@maxeyfirm.com</p> <p><i>Attorneys for Plaintiff and the Proposed Class</i></p>	<p>Suite 1800 Atlanta, GA 30309 Telephone: (404) 817-8412 Facsimile: (404) 881-0470 E-Mail: peter.hall@hklaw.com</p> <p>Paul Bond, <i>Admitted Pro Hac Vice</i> Cira Centre, Suite 800 2929 Arch Street Philadelphia, PA 19104 Telephone: (215) 252-9600 Facsimile: (215) 867-6070 E-Mail: paul.bond@hklaw.com</p> <p><i>Attorneys for Defendant The Paradies Shops, LLC</i></p>
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### **CERTIFICATE OF COMPLIANCE**

In compliance with N.D. Ga. LR. 7.1(D), I certify that the foregoing Notice of Filing has been prepared in conformity with N.D. Ga. LR. 5.1. This filing was prepared in Times New Roman 14-point type with a top margin of one and one-half (1 ½) inches and a left margin of one (1) inch.

/s/ Ryan D. Maxey

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 24, 2024, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Ryan D. Maxey